

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MISSOURI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE, ET AL.,

Plaintiffs,

V.

WENTZVILLE R-IV SCHOOL  
DISTRICT,

Defendant.

Case No. 4:22-cv-191-MTS

## **Motion for Protective Order**

Pursuant to Federal Rule of Civil Procedure 5.2(e)(1), Plaintiffs C.K.-W. and D.L. move this Court to enter an order directing the parties to use only the initials of any parent of C.K.-W. or D.L. in any filing in this case. In support, they state:

1. C.K.-W., a minor, brings her claim by and through her parent, T.K.
2. D.L., a minor, brings his claim by and through his parent, Z.L.
3. C.K.-W. and D.L. are challenging a policy of their public school.
4. Federal Rule of Civil Procedure 5.2(a)(3) and Local Rule of the United States

District Court for the Eastern District of Missouri 2.17(a)(2) mandate that only the initials of minor children may be listed in any filing.

5. Federal Rule of Civil Procedure 5.2(e)(1) permits this Court to enter a protective order requiring the reaction of additional information.

6. C.K.-W. and D.L. seek an order requiring the initials of their parents in place of their parents' full names in any filing in this action to further the intent of Federal Rule of Civil

Procedure 5.2(a)(3), Local Rule of the United States District Court for the Eastern District of Missouri 2.17(a)(2), the policies of the Judicial Conference of the United States, and Section 205(c)(3) of the E-Government Act of 2002 to promote electronic access to case files while also protecting personal privacy and other legitimate interests of minors in that revealing the full name of a minor plaintiff's parent would defeat the purpose of requiring that only the initials of minor children be listed in any filing.

7. In addition, C.K.-W. and D.L. and their parents qualify to proceed with some anonymity in that they are challenging a government action, have been accused of promoting illegal conduct, and are likely to face opprobrium and hostility from some members of the community, but the lesser protection of the use of initials appropriately balances the minors' interest in privacy with the customary openness of judicial proceedings.

WHEREFORE C.K.-W. and D.L. respectfully request this Court enter an order requiring that only the initials of the parents of C.K.-W. and D.L. be used in any filing submitted in this case and allowing such other and further relief as is just and proper.

Respectfully submitted,

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